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January 9, 2017

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Federal Election Commission
Jeff S. Jordan, Assistant General Counsel
Office of Complaints Examination
and Legal Administration
999 E. Street, NW
Washington, DC 20463

Re: MUR 7157

Dear Mr. Jordan:

We represent Priorities USA Action and Greg Speed, in his official capacity as Treasurer (together "Respondents"), in the above-referenced matter. Because the Complaint presents no evidence in support of an alleged violation by Respondents, it does not meet the regulatory requirements for a complaint that may be considered by the Commission. Thus, the Commission must find that no reason to believe a violation occurred, dismiss the allegations, and close the file.

The Complaint briefly and vaguely suggests, without substantiation, that Respondents sponsored coordinated communications and coordinated expenditures and violated applicable contribution limits.¹ Neither the Complaint nor the transcript of recordings in Exhibit A provides any information describing a particular communication or expenditure sponsored by Respondents or particular conduct by Respondents. To the extent the Complaint alleges that Respondents engaged in impermissible coordinated activities, Respondents unequivocally reject and deny these misleading and fictitious claims.

The Federal Election Commission ("FEC") must dismiss this Complaint under the standards it has established for evaluating allegations. A complaint must "contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction."² This Complaint does not meet that standard. Where an evidentiary showing fails to provide "a sufficiently specific allegation [] so as to warrant a focused investigation that can prove or disprove the charge," the Complaint must be dismissed.³ Similarly, unwarranted legal conclusions and mere speculation should not be credited.⁴ As the

¹ See Compl. ¶¶ 1 (reason to believe), 10 (description of status), 19 (reference to Respondents), 28 (spare legal conclusion).

² 11 C.F.R. § 111.4(d)(3).

³ See Statement of Reasons, Matter Under Review 4960 (Dec. 21, 2000).

⁴ Statement of Reasons, Matter Under Review 5141 (Apr. 17, 2002).

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Complaint fails to provide a specific allegation and consists of mere speculation and unsubstantiated legal conclusions, the Commission should, as it has in the past when faced with similar claims, conclude that "the complaint does not meet the threshold for finding reason to believe" any violation occurred.⁵

Respondents respectfully request the Commission promptly find no reason to believe any violation occurred, dismiss the matter and close the file. We appreciate the Commission's consideration of this response.

Very truly yours,



Marc E. Elias
Ezra W. Reese
David J. Lazarus
Counsel to Respondents

⁵ First General Counsel's Report, Matter Under Review 5304 (Jan. 21, 2004) at 9.